

Sylvia Bolos

From: Beth-Ann Krimsky <beth-ann.krimsky@gmlaw.com>
Sent: Tuesday, February 13, 2018 12:56 PM
To: Sylvia Bolos; Ian Lyngklip
Cc: Clemencia Corzo
Subject: RE: Keskitalo v. Sunpath, LTD, et al.; Motion for Entry of a Protective Order and Proposed Protective Order

I am not sure what you heard on your end but after you said the phone went dead on your end we then resumed the call and we picked up the conversation in which Ian told me you would not agree to an Order without the language we found to be objectionable, as it limits our rights to seek additional protections should the need arise. I told him that I wanted protections in place, especially now that you served discovery already, and that given we could not agree, we would seek to have the Court enter the proposed order that captured all of your requests but for the first two paragraphs.

Thank you. Beth-Ann

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From: Sylvia Bolos [mailto:SylviaB@MichiganConsumerLaw.com]
Sent: Tuesday, February 13, 2018 12:27 PM
To: Beth-Ann Krimsky; Ian Lyngklip
Cc: Clemencia Corzo
Subject: RE: Keskitalo v. Sunpath, LTD, et al.; Motion for Entry of a Protective Order and Proposed Protective Order

Beth-Ann,

During our conversation, you cut out for a moment, and after we resumed clear communications, the line went dead. I just wanted to confirm that you had intended to end the call at that point. If that is not the case, we are available to reconvene if there is anything further – please call our offices. Otherwise, I'd appreciate an email back confirming that the call was intentionally concluded.

Thank you,

Sylvia Bolos

From: Beth-Ann Krimsky [<mailto:beth-ann.krimsky@gmlaw.com>]

Sent: Tuesday, February 13, 2018 9:34 AM

To: Sylvia Bolos <SylviaB@MichiganConsumerLaw.com>; Ian Lyngklip <ian@MichiganConsumerLaw.com>

Cc: Clemencia Corzo <Clemencia.Corzo@gmlaw.com>

Subject: RE: Keskitalo v. Sunpath, LTD, et al.; Motion for Entry of a Protective Order and Proposed Protective Order

Sylvia,

Hello. I intend the draft Stipulated Protective Order I sent to you yesterday to include your proposed changes to what you refer to as paragraph 16(b) and I apologize that those date related matters were not included. Attached is an updated draft Stipulated Protective Order that includes your proposed changes to paragraph 16(b), but now reflected in paragraph 14(b) as I still cannot agree to the additions you want to make to the first 2 pages for the reasons we discussed at length previously. Please let me know if you are in agreement with the attached Stipulated Protective Order so that I can file it as part of a Joint Motion. Otherwise I will simply file it as part of my Motion for Entry of a Protective Order on behalf of Defendants only. As I stressed before, I would like to have this Order in place as soon as possible to allow discovery to proceed so please let me know today what your final position is. If you believe a telephone conference would be helpful I am available at 12:00 a.m. EST. Please let me know.

Thank you,

Beth-Ann

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From: Sylvia Bolos [<mailto:SylviaB@MichiganConsumerLaw.com>]

Sent: Tuesday, February 13, 2018 7:44 AM

To: Beth-Ann Krimsky; Ian Lyngklip

Cc: Clemencia Corzo

Subject: RE: Keskitalo v. Sunpath, LTD, et al.; Motion for Entry of a Protective Order and Proposed Protective Order

Beth-Ann,

Attached is the latest redline we sent over, the "clean" version you sent yesterday did not factor in any of the redlines in the attached document. Please return your redline of the document attached to this email.

Ian and I are available for a conference, should you need, anytime between 11am EST – 1pm EST.

Thank you,

Sylvia Bolos

From: Beth-Ann Krinsky [<mailto:beth-ann.krinsky@gmlaw.com>]

Sent: Monday, February 12, 2018 1:02 PM

To: Ian Lyngklip <ian@MichiganConsumerLaw.com>; Sylvia Bolos <SylviaB@MichiganConsumerLaw.com>

Cc: Clemencia Corzo <Clemencia.Corzo@gmlaw.com>

Subject: Keskitalo v. Sunpath, LTD, et al.; Motion for Entry of a Protective Order and Proposed Protective Order

Ian and Sylvia, Hello. I would like to try again to try to reach agreement on the proposed protective Order. Attached is the Proposed Order with what I believe to be all we agreed to except the first 2 introductory acknowledgement paragraphs you wanted from your last draft. Please let me know if you will agree to have me file the attached as part of a Joint Motion or if I will need to file it a motion purely on behalf of Defendants. I would like to have this order in place as soon as possible to allow discovery to proceed so please let me know as soon as you can. If you can today, that would be ideal. Thank you. Beth-Ann

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